UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re:

TERRORIST ATTACKS ON SEPTEMBER 11, 2001

Ber Barry Aron, individually, as surviving parent of Joshua Aron

Dana Aron Weiner, individually, as surviving sibling of Joshua Aron

Barbara Ann Sullivan, individually, as surviving sibling of James W. Barbella

Dorothy Blanding as Personal Representative of the Estate of Harry Blanding, Sr., deceased, the late parent of Harry Blanding, Jr.

Anthony Bocchi, individually, as surviving sibling of John Bocchi

Elena Bocchi, individually, as surviving parent of John Bocchi

Matthew Bocchi, individually, as surviving child of John Bocchi

Michael Bocchi, individually, as surviving child of John Bocchi

Michele Bocchi-Sandello, individually, as surviving spouse of John Bocchi

Nicholas Bocchi, individually, as surviving child of John Bocchi

Paul Bocchi, individually, as surviving child of John Bocchi

Ann Bocchi-Schwimmer, individually, as surviving sibling of John Bocchi

Diane Bocchi Esola, individually, as surviving sibling of John Bocchi

03-MDL-1570 (GBD)(SN)

Civil Docket Number:

IRAN SHORT FORM COMPLAINT AND DEMAND FOR TRIAL BY JURY

Elena Bocchi as Personal Representative of the Estate of Camillo Bocchi, deceased, the late parent of John Bocchi

Lucy Bocchi Kraus, individually, as surviving sibling of John Bocchi

Michele Bocchi-Sandello, as the Personal Representative of the Estate of John Bocchi, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of John Bocchi

Daphne Bowers, individually, as surviving parent of Veronique Bowers

Andrew Broderick, individually, as surviving child of Mark Broderick

Carolina Broderick, individually, as surviving spouse of Mark Broderick

James Broderick, individually, as surviving child of Mark Broderick

Matthew Broderick, individually, as surviving child of Mark Broderick

Carolina Broderick, as the Personal Representative of the Estate of Mark Broderick, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Mark Broderick

Angus Jacques, individually, as surviving parent of Felix Calixte

Christine Brozon, individually, as surviving spouse of Luigi Calvi

Christine Brozon, as the Personal Representative of the Estate of Luigi Calvi, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Luigi Calvi

James Cherry, individually, as surviving sibling of Vernon Cherry

Cynthia Taylor, individually, as surviving sibling of Vernon Cherry

Germaine Alexander, individually, as surviving sibling of Brenda Conway

Tammi Alexander, individually, as surviving sibling of Brenda Conway

Dennis Coughlin, individually, as surviving sibling of Timothy Coughlin

Francis Coughlin, Jr., individually, as surviving sibling of Timothy Coughlin

Robert Coughlin, individually, as surviving sibling of Timothy Coughlin

Maura Coughlin-Roberti, individually, as surviving spouse of Timothy Coughlin

Riley Coughlin-Roberti, individually, as surviving child of Timothy Coughlin

Ryann Coughlin-Roberti, individually, as surviving child of Timothy Coughlin

Sean Coughlin-Roberti, individually, as surviving child of Timothy Coughlin

Francis Coughlin, Jr. as Personal Representative of the Estate of Alice Coughlin, deceased, the late parent of Timothy Coughlin

Robert Coughlin and Francis Coughlin as Co-Personal Representatives of the Estate of Francis Coughlin, Sr., deceased, the late parent of Timothy Coughlin

Francis Coughlin, Jr. and Maura Coughlin-Roberti, as the Co-Personal Representatives of the Estate of Timothy Coughlin, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Timothy Coughlin

Regina Martin as Personal Representative of the Estate of Francis Cove, deceased, the late sibling of James Cove

Regina Martin as Personal Representative of the Estate of Margaret Cove, deceased, the late parent of James Cove

Regina Martin, individually, as surviving sibling of James Cove

Vancena Dawson Donovan, individually, as surviving sibling of Calvin Dawson

Vanita Aviles, individually, as surviving sibling of Calvin Dawson

Janita Clyne, individually, as surviving sibling of Calvin Dawson

Alvin Dawson, individually, as surviving sibling of Calvin Dawson

Annette Simon, individually, as surviving sibling of Calvin Dawson

Charles Dawson, individually, as surviving sibling of Calvin Dawson

Janet Dawson, individually, as surviving sibling of Calvin Dawson

Lena Dawson, individually, as surviving spouse of Calvin Dawson

Tatiana Dawson, individually, as surviving child of Calvin Dawson

Victorine Dawson, individually, as surviving sibling of Calvin Dawson

Doris Hetherington, individually, as surviving sibling of Calvin Dawson

Lena Dawson, as the Personal Representative of the Estate of Calvin Dawson, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Calvin Dawson

Daniella De La Pena, individually, as surviving child of Emerita De la Pena

Gabriel De La Pena, individually, as surviving spouse of Emerita De La Pena

Gabriel De La Pena, as the Personal Representative of the Estate of Emerita De La Pena, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Emerita De La Pena

Ronald Sierra, individually, as surviving spouse of Judith Berquis Diaz-Sierra

Ronald Sierra, as the Personal Representative of the Estate of Judith Berquis Diaz-Sierra, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Judith Berquis Diaz-Sierra

Marlyse Salome Bosley, individually, as surviving sibling of Jose Espinal

Saul Espinal Ramos, individually, as surviving sibling of Jose Espinal

Eileen Esquilin, individually, as surviving sibling of Ruben Esquilin

Marybelle Vargas, individually, as surviving sibling of Ruben Esquilin

John Doe 86, being intended to designate the Personal Representative of the Estate of Wendy Faulkner, deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a court of competent jurisdiction (or having been so appointed, his or her appointment has expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on behalf of all survivors and all legally entitled beneficiaries and family members of Wendy Faulkner

Stephen Morris, individually, as surviving sibling of Wendy Faulkner

Annette Fields, individually, as surviving sibling of Samuel Fields, Sr.

Felicia Fields, individually, as surviving sibling of Samuel Fields, Sr.

Michael Fields, individually, as surviving sibling of Samuel Fields, Sr.

Kevin Finnerty, individually, as surviving sibling of Timothy Finnerty

Peter Finnerty, individually, as surviving parent of Timothy Finnerty

Theresa Roberts, individually, as surviving spouse of Timothy Finnerty

Theresa Roberts, as the Personal Representative of the Estate of Timothy Finnerty, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Timothy Finnerty

Louise Flickinger as Personal Representative of the Estate of Carl J. Flickinger, deceased, the late parent of Carl M. Flickinger

Alana Flickinger, individually, as surviving child of Carl M. Flickinger

Carl J. Flickinger, individually, as surviving child of Carl M. Flickinger

Craig T. Flickinger, individually, as surviving child of Carl M. Flickinger

Edmund Flickinger, individually, as surviving sibling of Carl M. Flickinger

Kathleen Flickinger, individually, as surviving spouse of Carl M. Flickinger

Louise Flickinger, individually, as surviving parent of Carl M. Flickinger

Robert Flickinger, individually, as surviving sibling of Carl M. Flickinger

Lisa Madden, individually, as surviving sibling of Carl M. Flickinger

Kathleen Flickinger, as the Personal Representative of the Estate of Carl M. Flickinger, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Carl M. Flickinger

Sylvia Aleman, individually, as surviving sibling of Claudia Foster

Blanca Martinez, individually, as surviving parent of Claudia Foster

Carlos Martinez, individually, as surviving parent of Claudia Foster

Karen Carlucci, individually, as surviving spouse of Peter Frank

Constance Frank, individually, as surviving parent of Peter Frank

Michelle Frank, individually, as surviving sibling of Peter Frank

Peter Frank, individually, as surviving parent of Peter Frank

John Doe 87, being intended to designate the Personal Representative of the Estate of Peter Frank, deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a court of competent jurisdiction (or having been so appointed, his or her appointment has expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on behalf of all survivors and all legally entitled beneficiaries and family members of Peter Frank

Edward Gnazzo, individually, as surviving sibling of John Gnazzo

Nicholas Gnazzo, individually, as surviving sibling of John Gnazzo

Song Jeng, individually, as surviving parent of John Gnazzo

Luz America Piedrahita Ayala, individually, as surviving parent of Wilder Gomez

Jairo Gomez, individually, as surviving sibling of Wilder Gomez

Omar Gomez, individually, as surviving sibling of Wilder Gomez

Walter Gomez, individually, as surviving sibling of Wilder Gomez

Kathleen Griffin, individually, as surviving sibling of John Griffin

Lucy Aita, individually, as surviving spouse of Paul Innella

Lucy Aita, as the Personal Representative of the Estate of Paul Innella, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Paul Innella

Plaintiff(s),

-against-

Islamic Republic of Iran,

Defendant.

Plaintiffs named herein by and through the undersigned counsel file this Iran Short Form Complaint against Defendant, the Islamic Republic of Iran ("Iran"), arising out of the September 11, 2001 terrorist attacks ("September 11, 2001 Terrorist Attacks"), as permitted and approved by the Court's Order of October 28, 2019, ECF No. 5234. Each Plaintiff incorporates by reference the specific allegations, as indicated below, of (a) the <u>Federal Insurance</u> and <u>Ashton</u> Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237, or (b) the Amended Complaint, <u>Burnett v. Islamic Republic of Iran</u>, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53.

Upon filing this Short Form Complaint, each Plaintiff is deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as specified below; all causes of action contained within that complaint; all prior filings in connection with that complaint; and all prior Orders and rulings of the Court in connection with that complaint.

Additionally, each Plaintiff incorporates the factual allegations and findings contained in those pleadings and orders filed at <u>Havlish v. Bin Laden</u>, No. 1:03-CV-9848 (GBD)(SN) (S.D.N.Y.), ECF Nos. 263, 294, 295; <u>In re Terrorist Attacks on September 11, 2001</u>, 03-MDL-1570 (GBD)(SN) (S.D.N.Y.), ECF Nos. 2430, 2431, 2432, 2433, 2473, 2515, 2516; and evidence submitted at the proceedings before the Honorable George B. Daniels on December 15, 2011 (ECF No. 2540).

VENUE

1. Venue in this district is proper pursuant to 28 U.S.C. §§ 1391(b)(2) and 1391(f)(1), as a substantial part of the events giving rise to the claims asserted herein occurred in this district. Venue is also proper in this district pursuant to 18 U.S.C. § 2334(a).

JURISDICTION

2. Jurisdiction against the Islamic Republic of Iran is premised on the grounds set forth in the complaints specified below, including but not limited to 28 U.S.C. § 1605(a) (tort exception to the Foreign Sovereign Immunities Act), 28 U.S.C. § 1605A (terrorism exception to the Foreign Sovereign Immunities Act), and 28 U.S.C. § 1605B (Justice Against Sponsors of Terrorism Act).

CAUSES OF ACTION

3. Each Plaintiff hereby adopts and incorporates by reference all factual allegations, jurisdictional allegations, and jury trial demand, including all causes of action against the Islamic Republic of Iran, as set forth in the following complaint [check only one complaint]:

- ☐ <u>Federal Insurance</u> and <u>Ashton</u> Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237
- ☑ Amended Complaint, <u>Burnett v. Islamic Republic of Iran</u>, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53
- 4. In addition, each Plaintiff hereby asserts the following additional causes of action:
- ☑ Iran Short Form Complaint First Cause of Action to Recover Wrongful Death Damages Pursuant to 28 U.S.C. § 1605B (the Justice Against Sponsors of Terrorism Act or JASTA) and 18 U.S.C. § 2333 et seq. (the Anti-Terrorism Act or ATA)

As a factual basis for this cause of action, Plaintiff(s) allege that the allegations set forth in the complaint noted above, as well as the allegations set forth in the Havlish filings noted above, establish that, as set forth herein, the injuries they suffered arose from the September 11, 2001 Terrorist Attacks; Defendant's role in the September 11, 2001 Terrorist Attacks constituted acts of international terrorism that violated state and federal laws pursuant to 18 U.S.C. § 2331; that the September 11, 2001 Terrorist Attacks constituted acts of international terrorism committed, planned or authorized by an organization that had been designated as a foreign terrorist organization under 8 U.S.C. § 1189; that the September 11, 2001 Terrorist Attacks violated state and federal laws pursuant to 18 U.S.C. § 2331; and that Defendant aided and abetted, by knowingly providing substantial assistance, with others and/or conspired with others who committed an act or acts of international terrorism in violation of 18 U.S.C. § 2333 et seq.

☐ Iran Short Form Complaint First Cause of Action to Recover Personal Injury Damages Pursuant to 28 U.S.C. § 1605B (the Justice Against Sponsors of Terrorism Act or JASTA) and 18 U.S.C. § 2333 *et seq.* (the Anti-Terrorism Act or ATA)

As a factual basis for this cause of action, Plaintiff(s) allege that the allegations set forth in the complaint noted above, as well as the allegations set forth in the <u>Havlish</u> filings noted above, establish that, as set forth herein, the injuries they suffered arose from the September 11, 2001 Terrorist Attacks; Defendant's role in the September 11, 2001 Terrorist Attacks constituted acts of international terrorism that violated state and federal laws pursuant to 18 U.S.C. § 2331; that the September 11, 2001 Terrorist Attacks constituted acts of international terrorism committed, planned or authorized by an organization that had been designated as a foreign terrorist organization under 8 U.S.C. § 1189; that the September 11, 2001 Terrorist Attacks violated state and federal laws pursuant to 18 U.S.C. § 2331; and that Defendant aided and abetted, by knowingly providing substantial assistance, with others and/or conspired with others who committed an act or acts of international terrorism in violation of 18 U.S.C. § 2333 et sea.

IDENTIFICATION OF NEW PLAINTIFFS

- 5. The following allegations and information are alleged on behalf of each individual who is bringing this claim, as indicated on Appendix 1 to this Iran Short Form Complaint, herein referred to as "Plaintiffs."
 - a. The citizenship/nationality of each Plaintiff is indicated at Appendix 1 to this Iran Short Form Complaint.
 - b. Plaintiff is entitled to recover damages on the causes of action set forth in the complaint identified above, as joined by this Iran Short Form Complaint, and as further asserted within this Iran Short Form Complaint.
 - c. As indicated at Appendix 1, Plaintiff (i) is the estate representative of someone who was killed as a result of the September 11, 2001 Terrorist Attacks; (ii) is the surviving immediate family member of someone who was killed as a result of the September 11, 2001 Terrorist Attacks; and/or (iii) suffered physical injuries as a result of the September 11, 2001 Terrorist Attacks.
 - d. For those plaintiffs with personal injury claims, as indicated in Appendix 1, on or after September 11, 2001, said Plaintiff was present at the Pentagon and/or the World Trade Center site and/or its surroundings and/or lower Manhattan and/or at an area wherein he/she was exposed to toxins as a result of the terrorist attacks and was exposed to toxins from the attacks, and/or was otherwise injured, and/or as otherwise alleged, as stated specifically in Appendix 1.
 - e. For those plaintiffs with personal injury and/or wrongful death claims, as indicated in Appendix 1, as a direct, proximate and foreseeable result of Defendant's actions or inactions, Plaintiff or his or her decedent suffered bodily injury and/or death, and consequently economic and other losses, including but not limited to pain and suffering, emotional distress, psychological injuries, and loss of enjoyment of life, and/or as described in the Iran Short Form Complaint, and/or as otherwise may be specified in subsequent discovery proceedings, and/or as otherwise alleged in Appendix 1.
 - f. The name, relationship to the injured and/or deceased September 11 victim, residency, citizenship/nationality, and the general nature of the claim for each plaintiff asserting wrongful death and/or solatium claims is listed on the attached Appendix 1, and is incorporated herein as allegations, with all allegations of the related complaints, as specified above, deemed alleged as to each Plaintiff.

IDENTIFICATION OF THE DEFENDANT

6. The only Defendant named in this Iran Short Form Complaint is the Islamic Republic of Iran.

NO WAIVER OF OTHER CLAIMS

- 7. By filing this Iran Short Form Complaint, Plaintiffs are not waiving any right to file suit against any other potential defendants or parties.
- 8. By filing this Iran Short Form Complaint, Plaintiffs are not opting out of any class that the Court may certify in the future.

JURY DEMAND

9. Each Plaintiff hereby demands a trial by jury as to the claims in this action.

WHEREFORE, Plaintiffs pray for relief and judgment against Defendant as set forth in this Iran Short Form Complaint as appropriate.

Dated: November 9, 2020

Respectfully submitted,

/s/ Jerry S. Goldman

Jerry S. Goldman, Esq. Bruce Strong, Esq. ANDERSON KILL P.C. 1251 Avenue of the Americas New York, NY 10020 Telephone: 212-278-1000 jgoldman@andersonkill.com bstrong@andersonkill.com

Attorneys for Plaintiffs

APPENDIX 1

Each line below is deemed an allegation, incorporating the allegations, language, and references within the Iran Short Form Complaint to which this Appendix 1 is appended and shall be referenced as Allegation 1 of Appendix 1 to the Iran Short Form Complaint, Allegation 2 of Appendix 1 to the Iran Short Form Complaint, etc.

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at Filing (or death)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Full Name	to 9/11 Decedent ¹	9/11 Decedent's Citizenship/ Nationality on 9/11/01	Nature of Claim (wrongful death, solatium, personal injury) ²
1	Ber Barry Aron	MD	United States	Joshua Aron	Parent	United States	Solatium
2	Dana Aron Weiner	IL	United States	Joshua Aron	Sibling	United States	Solatium
3	Barbara Ann Sullivan	TX	United States	James W. Barbella	Sibling	United States	Solatium
4	Dorothy Blanding as Personal Representative of the Estate of Harry Blanding, Sr.	NJ	Unied States	Harry Blanding, Jr.	Parent (deceased)	United States	Solatium
5	Anthony Bocchi	NJ	United States	John Bocchi	Sibling	United States	Solatium
6	Elena Bocchi	NJ	United States	John Bocchi	Parent	United States	Solatium
7	Matthew Bocchi	NJ	United States	John Bocchi	Child	United States	Solatium
8	Michael Bocchi	NJ	United States	John Bocchi	Child	United States	Solatium
9	Michele Bocchi- Sandello	NJ	United States	John Bocchi	Spouse	United States	Solatium
10	Nicholas Bocchi	NJ	United States	John Bocchi	Child	United States	Solatium
11	Paul Bocchi	NJ	United States	John Bocchi	Child	United States	Solatium
12	Ann Bocchi- Schwimmer	NJ	United States	John Bocchi	Sibling	United States	Solatium
13	Diane Bocchi Esola	FL	United States	John Bocchi	Sibling	United States	Solatium
14	Elena Bocchi as Personal Representative of the Estate of Camillo Bocchi	NJ	United States	John Bocchi	Parent (deceased)	United States	Solatium
15	Lucy Bocchi Kraus	NJ	United States	John Bocchi	Sibling	United States	Solatium

¹ For those identified as "PR," such claim is made as the Personal Representative of the Decedent's Estate and on behalf of all survivors and all legally entitled beneficiaries and family members of such Decedent as noted in the case caption.

² The PRs identified below are bringing solatium claims on behalf of all survivors and all legally entitled beneficiaries and family members of such Decedent as noted in the case caption.

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at Filing (or death)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Full Name	Plaintiff's Relationship to 9/11 Decedent ¹	9/11 Decedent's Citizenship/ Nationality on 9/11/01	Nature of Claim (wrongful death, solatium, personal injury) ²
16	Michele Bocchi- Sandello	NJ	United States	John Bocchi	PR	United States	Solatium/Wrongful Death
17	Daphne Bowers	NY	United States	Veronique Bowers	Parent	United States	Solatium
18	Andrew Broderick	NJ	United States	Mark Broderick	Child	United States	Solatium
19	Carolina Broderick	NJ	United States	Mark Broderick	Spouse	United States	Solatium
20	James Broderick	NJ	United States	Mark Broderick	Child	United States	Solatium
21	Matthew Broderick	NJ	United States	Mark Broderick	Child	United States	Solatium
22	Carolina Broderick	NJ	United States	Mark Broderick	PR	United States	Solatium/Wrongful Death
23	Angus Jacques	St. Lucia	United States	Felix Calixte	Parent	United States	Solatium
24	Christine Brozon	NY	United States	Luigi Calvi	Spouse	Italy	Solatium
25	Christine Brozon	NY	United States	Luigi Calvi	PR	Italy	Solatium/Wrongful Death
26	James Cherry	MD	United States	Vernon Cherry	Sibling	United States	Solatium
27	Cynthia Taylor	GA	United States	Vernon Cherry	Sibling	United States	Solatium
28	Germaine Alexander	NY	United States	Brenda Conway	Sibling	United States	Solatium
29	Tammi Alexander	NY	United States	Brenda Conway	Sibling	United States	Solatium
30	Dennis Coughlin	NY	United States	Timothy Coughlin	Sibling	United States	Solatium
31	Francis Coughlin, Jr.	NY	United States	Timothy Coughlin	Sibling	United States	Solatium
32	Robert Coughlin	NY	United States	Timothy Coughlin	Sibling	United States	Solatium
33	Maura Coughlin- Roberti	NY	United States	Timothy Coughlin	Spouse	United States	Solatium
34	Riley Coughlin- Roberti	NY	United States	Timothy Coughlin	Child	United States	Solatium
35	Ryann Coughlin- Roberti	NY	United States	Timothy Coughlin	Child	United States	Solatium
36	Sean Coughlin- Roberti	NY	United States	Timothy Coughlin	Chld	United States	Solatium
37	Francis Coughlin, Jr. as Personal Representative of the Estate of Alice Coughlin	NY	United States	Timothy Coughlin	Parent (deceased)	United States	Solatium
38	Robert Coughlin and Francis Coughlin as Co- Personal Representatives of the Estate of Francis Coughlin, Sr.	NY	United States	Timothy Coughlin	Parent (deceased)	United States	Solatium

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at Filing (or death)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Full Name	Plaintiff's Relationship to 9/11 Decedent ¹	9/11 Decedent's Citizenship/ Nationality on 9/11/01	Nature of Claim (wrongful death, solatium, personal injury) ²
39	Francis Coughlin, Jr. and Maura Couglin-Roberti	NY	United States	Timothy Coughlin	Co-PRs	United States	Solatium/Wrongful Death
40	Regina Martin as Personal Representative of the Estate of Francis Cove	FL	United States	James Cove	Sibling (deceased)	United States	Solatium
41	Regina Martin as Personal Representative of the Estate of Margaret Cove	FL	United States	James Cove	Parent (deceased)	United States	Solatium
42	Regina Martin	FL	United States	James Cove	Sibling	Unites States	Solatium
43	Vancena Dawson Donovan	USVI		Calvin Dawson	Sibling	United States	Solatium
44	Vanita Aviles	PR	United States	Calvin Dawson	Sibling	United States	Solatium
45	Janita Clyne	British VI	United States	Calvin Dawson	Sibling	United States	Solatium
46	Alvin Dawson	GA	Britain	Calvin Dawson	Sibling	United States	Solatium
47	Annette Simon	NY	Non-U.S.	Calvin Dawson	Sibling	United States	Solatium
48	Charles Dawson	British Virgin Islands	Britain	Calvin Dawson	Sibling	United States	Solatium
49	Janet Dawson	NY	Non-U.S.	Calvin Dawson	Sibling	United States	Solatium
50	Lena Dawson	GA	United States	Calvin Dawson	Spouse	United States	Solatium
51	Tatiana Dawson	GA	United States	Calvin Dawson	Child	United States	Solatium
52	Victorine Dawson	USVI	United States	Calvin Dawson	Sibling	United States	Solatium
53	Doris Hetherington	VI	British Virgin Islands	Calvin Dawson	Sibling	United States	Solatium
54	Lena Dawson	TBD	United States	Calvin Dawson	PR	United States	Solatium/Wrongful Death
55	Daniella De La Pena	FL	United States	Emerita De la Pena	Child	United States	Solatium
56	Gabriel De La Pena	FL	United States	Emerita De La Pena	Spouse	United States	Solatium
57	Gabriel De La Pena	FL	United States	Emerita De La Pena	PR	United States	Solatium/Wrongful Death
58	Ronald Sierra	NY	United States	Judith Berquis Diaz-Sierra	Spouse	United States	Solatium
59	Ronald Sierra	NY	United States	Judith Berquis Diaz-Sierra	PR	United States	Solatium/Wrongful Death
60	Marlyse Salome Bosley	AZ	United States	Jose Espinal	Sibling	United States	Solatium
61	Saul Espinal Ramos	Canada	Canada	Jose Espinal	Sibling	United States	Solatium
62	Eileen Esquilin	NJ	United States	Ruben Esquilin	Sibling	United States	Solatium
63	Marybelle Vargas	NY	United States	Ruben Esquilin	Sibling	United States	Solatium
64	John Doe 86	TBD	United States	Wendy Faulkner	PR	United States	Solatium/Wrongful Death

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at Filing (or death)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Full Name	Plaintiff's Relationship to 9/11 Decedent ¹	9/11 Decedent's Citizenship/ Nationality on 9/11/01	Nature of Claim (wrongful death, solatium, personal injury) ²
65	Stephen Morris	NY	Australia	Wendy Faulkner		United States	Solatium
66	Annette Fields	NY	United States	Samuel Fields, Sr.	Sibling	United States	Solatium
67	Felicia Fields	NY	United States	Samuel Fields, Sr.	Sibling	United States	Solatium
68	Michael Fields	NY	United States	Samuel Fields, Sr.	Sibling	United States	Solatium
69	Kevin Finnerty	MN	United States	Timothy Finnerty	Sibling	United States	Solatium
70	Peter Finnerty	NJ	United States	Timothy Finnerty	Parent	United States	Solatium
71	Theresa Roberts	NJ	United States	Timothy Finnerty	Spouse	United States	Solatium
72	Theresa Roberts	NJ	United States	Timothy Finnerty	PR	United States	Solatium/Wrongful Death
73	Louise Flickinger as Personal Representative of the Estate of Carl J. Flickinger		United States	Carl M. Flickinger	Parent (deceased)	United States	Solatium
74	Alana Flickinger	NY	United States	Carl M. Flickinger	Child	United States	Solatium
75	Carl J. Flickinger	NY	United States	Carl M. Flickinger	Child	United States	Solatium
76	Craig T. Flickinger	NY	United States	Carl M. Flickinger	Child	United States	Solatium
77	Edmund Flickinger	NY	United States	Carl M. Flickinger	Sibling	United States	Solatium
78	Kathleen Flickinger	NY	United States	Carl M. Flickinger	Spouse	United States	Solatium
79	Louise Flickinger	NY	United States	Carl M. Flickinger	Parent	United States	Solatium
80	Robert Flickinger	PA	United States	Carl M. Flickinger	Sibling	United States	Solatium
81	Lisa Madden	NJ	United States	Carl M. Flickinger	Sibling	United States	Solatium
82	Kathleen Flickinger	NY	United States	Carl M. Flickinger	PR	United States	Solatium/Wrongful Death
83	Sylvia Aleman	NY	United States	Claudia Foster	Sibling	United States	Solatium
84	Blanca Martinez	NY	Honduras	Claudia Foster	Parent	United States	Solatium
85	Carlos Martinez	NY	Guatemala	Claudia Foster	Parent	United States	Solatium
86	Karen Carlucci	NY	United States	Peter Frank	Spouse	United States	Solatium
87	Constance Frank	NY	United States	Peter Frank	Parent	United States	Solatium
88	Michelle Frank	RI	United States	Peter Frank	Sibling	United States	Solatium
89	Peter Frank	NY	United States	Peter Frank	Parent	United States	Solatium
90	John Doe 87	TBD	TBD	Peter Frank	PR	United States	Solatium/Wrongful Death
91	Edward Gnazzo	NY	United States	John Gnazzo	Sibling	United States	Solatium
92	Nicholas Gnazzo	NY	United States	John Gnazzo	Sibling	United States	Solatium

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at Filing (or death)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Full Name	Plaintiff's Relationship to 9/11 Decedent ¹	9/11 Decedent's Citizenship/ Nationality on 9/11/01	Nature of Claim (wrongful death, solatium, personal injury) ²
93	Song Jeng	NY	United States	John Gnazzo	Parent	United States	Solatium
94	Luz America Piedrahita Ayala	NY	Colombia	Wilder Gomez	Parent	Colombia	Solatium
95	Jairo Gomez	NY	Colombia	Wilder Gomez	Sibling	Colombia	Solatium
96	Omar Gomez	NY	Colombia	Wilder Gomez	Sibling	Colombia	Solatium
97	Walter Gomez	NY	Colombia	Wilder Gomez	Sibling	Colombia	Solatium
98	Kathleen Griffin	NJ	United States	John Griffin	Sibling	United States	Solatium
99	Lucy Aita	NJ	United States	Paul Innella	Spouse	United States	Solatium
100	Lucy Aita	NJ	United States	Paul Innella	PR	United States	Solatium/Wrongful Death